

PEM LAW LLP

Rajiv D. Parikh (032462005)
Kathleen Barnett Einhorn (040161992)
Jessica A. Merejo (288592020)
1 Boland Drive, Suite 101
West Orange, NJ 07502
Telephone: (973) 577-550
Facsimile: (973) 860-4433
Email: rparikh@pemplawfirm.com
keinhorn@pemplawfirm.com
jmerejo@pemplawfirm.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY CORPORATION,
*as assignee of individuals who are Covered
Persons*, PATRICK COLLIGAN, and
PETER ANDREYEV,

Plaintiffs,

v.

DARKOWL, LLC, RICHARD ROES 1-10,
*fictitious names of unknown individuals and
ABC COMPANIES 1-10, fictitious names of
unknown entities*,

Defendants.

Civ. Action No. 1:24-cv-10600

**NOTICE OF MOTION FOR THE *PRO
HAC VICE* ADMISSION FOR OF
EKWAN E. RHOW**

**NOTICE OF MOTION
FOR *PRO HAC VICE* ADMISSION OF EKWAN E. RHOW**

TO: All Counsel of Record

PLEASE TAKE NOTICE that Plaintiff Atlas Data Privacy Corporation (“Plaintiff”) respectfully moves this Court pursuant to *Local Civ. R. 101.1(c)* to admit Ekwon E. Rhon *pro hac vice* in connection with this matter.

PLEASE TAKE FURTHER NOTICE that Plaintiff will rely upon the Certification of Jessica A. Merejo, Esq., and Certification of Ekwan E. Rhaw in support of this application. A proposed Order is attached.

Respectfully submitted,

PEM LAW LLP

Dated: January 9, 2025

By: *s/ Jessica A. Merejo*

JESSICA A. MEREJO

PEM LAW LLP

Rajiv D. Parikh (032462005)
Kathleen Barnett Einhorn (040161992)
Jessica A. Merejo (288592020)
1 Boland Drive, Suite 101
West Orange, NJ 07502
Telephone: (973) 577-550
Facsimile: (973) 860-4433
rparikh@pemplawfirm.com
keinhorn@pemplawfirm.com
jmerejo@pemplawfirm.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY CORPORATION,
*as assignee of individuals who are Covered
Persons*, PATRICK COLLIGAN, and
PETER ANDREYEV,

Plaintiffs,

v.

DARKOWL, LLC, RICHARD ROES 1-10,
*fictitious names of unknown individuals and
ABC COMPANIES 1-10, fictitious names of
unknown entities*,

Defendants.

Civ. Action No. 1:24-cv-10600

CERTIFICATE OF SERVICE

I, JESSICA A. MEREJO of full age, hereby certify as follows:

1. I am an attorney at law within the State of New Jersey and a member of PEM Law LLP, attorneys for plaintiffs in the above-captioned matter. I am admitted to practice in the United States District Court for the District of New Jersey. I have personal knowledge of the information provided in this Certification in accordance with *Local Civ. R. 7.2(a)*.

2. I am a member in good standing of the bar of this Court.

3. On this date, I filed a true and correct copy of the Motion for Pro Hac Vice Admission of Ekwan E. Rhow, along with the Notice of Motion, Certification of Ekwan E. Rhow, the Certification of Counsel, and Proposed Order.

Dated: January 9, 2025

s/ Jessica A. Merejo
JESSICA A. MEREJO